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December 10, 2024

**Via CM/ECF**

Hon. Frederick J. Scullin, Jr., Senior U.S. District Judge  
U.S. District Court for the Northern District of New York  
James M. Hanley Federal Building & U.S. Courthouse  
100 S. Clinton St., P.O. Box 7255  
Syracuse, New York 13261

Hon. Daniel J. Stewart, U.S. Magistrate Judge  
U.S. District Court for the Northern District of New York  
James T. Foley U.S. Courthouse  
445 Broadway, 4th Floor  
Albany, New York 12207

Re: **Response to Status Report**  
***Prime Capital Ventures, LLC v Reign Financial International, Inc., et al.***  
Case No.: 1:23-cv-00207 (FJS/DJS)

Dear Judge Scullin and Magistrate Stewart:


This firm represents Plaintiff Prime Capital Ventures, LLC (“Plaintiff”) in the above referenced action. Pursuant to the Court’s December 5, 2024 text order, I write to confirm that Plaintiff concurs with the status report submitted by its bankruptcy counsel, attorney Fred Stevens of Klestadt Winters Jureller Southard & Stevens, LLP ([Dkt. No. 61](#)), including the position that this action is not stayed by Plaintiff’s pending bankruptcy proceeding. Plaintiff would welcome a decision on the pending Motion to Dismiss and Motion to Amend at the Court’s convenience.

Thank you for your time and attention to this matter.

Very truly yours,

**GIRVIN & FERLAZZO, P.C.**

By:

  
Daniel S. L. Rubin, Esq.

Cc: (via CM/ECF) Matthew A. Toporowski, Esq.